

4. The Plaintiffs incorporate by reference the accompanying Memorandum of Law and the Declarations attached to this Motion as Exhibits 1–2.

5. The Plaintiffs’ litigation concerns sensitive and highly personal matters—namely intimate partner assault and sexual assault that occurred when both were under twenty-one years old. These issues are the paradigmatic examples of private issues that warrant a grant of anonymity.

6. As students and young adults, the Plaintiffs are at risk of, and highly susceptible to, harassment and other harms from their peers, the University community, future employers, and the public at large if their identities and the details of their assaults and/or their allegations are made public.

7. Rather than requesting complete anonymity, the Plaintiffs are prepared to stipulate to a protective order with Defendants that would appropriately protect disclosure of their identities from the public.

8. In sum, neither Defendants nor the public will be prejudiced if the Plaintiffs are permitted to proceed pseudonymously, but disclosure of the Plaintiffs’ identities constitutes an extreme intrusion on the Plaintiffs’ privacy and places them at risk of harassment.

Respectfully submitted,

MACEY SWANSON LLP

/s/Jeffrey A. Macey
Jeffrey A. Macey, Atty No. 28378-49
Attorney for Plaintiffs

MACEY SWANSON LLP
445 North Pennsylvania Street
Suite 401
Indianapolis, IN 46204-1800
Telephone: (317)637-2345
Facsimile: (317)637-2369
E-Mail: jmacey@maceylaw.com

CERTIFICATE OF SERVICE

The undersigned certifies that on March 14, 2019, a copy of the foregoing was served via operation of the Court's electronic filing system on all Counsel of Record.

Respectfully submitted,

/s/ Jeffrey A. Macey
Jeffrey A. Macey, Atty No. 28378-49
Attorney for Plaintiffs

MACEY SWANSON LLP
445 North Pennsylvania Street
Suite 401
Indianapolis, IN 46204-1800
Telephone: (317)637-2345
Facsimile: (317)637-2369
E-Mail: jmacey@maceylaw.com